

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES
INC., JADE CHENG, JASON YUYI,
CATHY YU, CAROLINE MARAFAO
CHENG, PUSHUN CHENG, CHANGZHEN
NI, JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, AND CHANGHUA NI

Plaintiffs,

v.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES
(INDIA) PRIVATE LIMITED, HP INC.,
HEWLETT PACKARD ENTERPRISE
COMPANY, AND DAVID GILL,

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

MOTION FOR REMOTE RULE 35 MEDICAL EXAMINATIONS

Plaintiffs hereby move for the following relief, for the reasons set forth in the accompanying

Memorandum:

1. That the court set aside the ruling in its Amended Scheduling Order requiring them to appear in the United States for their Rule 35 medical examinations

Local Rule 7.1(a)(2) Certification

I, Luke Nikas, Attorney for Plaintiffs Alexander Styler, Integrated Communications & Technologies, Inc., Jade Cheng, Jason Yuyi, Cathy Yu, Carolina Marafao Cheng, Pushun Cheng, Changzhein Ni, JunFang Yu, Meixiang Cheng, Fangshou Yu, and Changhua Ni hereby certify that on December 30, 2020, and January 28, 2021, I communicated Defendants' counsel in a good faith attempt to confer regarding the issues raised in this Motion. On January 7, 2021 Defendants' counsel Paul Saso informed me that "Defendants are unwilling to stipulate to allowing [the Overseas Plaintiffs] to submit to remote medical examinations via Zoom, and will oppose any application in that regard." On January 29, 2021, Mr. Saso affirmed that position. The parties are thus at an impasse.

/s/ Luke Nikas
Luke Nikas

DATED: January 29, 2021

Respectfully Submitted

/s/ Luke Nikas
Luke Nikas
Alex Spiro
Alex Zuckerman
Quinn Emanuel Urquhart & Sullivan, LLP

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